means for updating the second map to display the annotation at a geographic region that corresponds to the first region of the first map.

20.   (Amended)   The apparatus of claim 19 further comprising:

means for receiving a command to change a view;

means for receiving a responsive display of the first map, the responsive display being representative of the user interaction; and

means for receiving of a display of a second region on the second map, the second region being geographically substantially similar to the first region.

REMARKS

This is in reply to the Examiner's Official Action dated October 17, 2002. Claims 1-20 are currently pending. By this Amendment, the specification, and claims 1-4, 7, 8, 11, 15, 19 and 20 have been amended to more appropriately describe and claim the invention. The above amendment with the following remarks are submitted to be fully responsive to the Official Action. Reconsideration of this application in light of these remarks, and allowance of this application are respectfully requested.

I.   Specification

Applicants have corrected minor grammatical errors.

III.   Rejection of Claims Under 35 U.S.C. § 102(b)

In paragraph 2 of the Official Action, the Examiner rejected claims 1-20 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,487,139 to Saylor et al. (hereinafter, Saylor). According to the Examiner, Saylor teaches:

a map generating method including steps of: obtaining/receiving a raster image of an existing map; providing a vector database having information characteristic to the territory (region) represented by a rasterized map (i.e., a first map); displaying a vector map (i.e., a second map) from the database, the displayed vector map containing information characteristic to the territory depicted in the rasterized map; substantially aligning corresponding areas of the raster map and the vector map (i.e., automatically manipulating a second map)(see for example, column 2, lines 27-48.)

(Official Action of October 17, 2002 at page 2.)

The present invention as recited in amended claims 1-14 is directed to a method for manipulating a map, comprising: displaying a first map in one area of a display; displaying a second map in a second area of the display, wherein the first map and the second map depict at least a portion of an identical geographic region; making an annotation on a first region of the first map; and updating the second map to display the annotation at a geographic region that corresponds to the first region of the first map. Claims 15-18 similarly recite a computer readable medium containing instructions executable by a computer to manipulate a map, the method comprising: displaying a first map in one area of a display; displaying a second map in a second area of the display, wherein the first map and the second map depict at least a portion of an identical geographic region; making an annotation on a first region of the first map; and updating the second map to display the annotation at a geographic region that corresponds to the first region of the first map. Claim 19-20 likewise recite an apparatus for manipulating a map, comprising: means for displaying a first map in one area of a display; means for displaying a second map in a second area of the display, wherein the first map and the second map depict at least a portion of an identical geographic region; means for making an annotation on a first region of the first map; and means for

updating the second map to display the annotation at a geographic region that corresponds to the first region of the first map.

Support for these amendments is found in the Applicants' specification on pages 9-10. In making the various references to the specification set forth herein, it is to be understood that Applicants are in no way intending to limit the scope of the claims to the exemplary embodiments shown in the drawings and described in the specification. Rather, Applicants expressly affirm that they are entitled to have the claims interpreted broadly, to the maximum extent permitted by statute, regulation and applicable case law.

Anticipation under 35 U.S.C. §102(b) requires that each and every claim limitation be disclosed by the applied reference. Saylor does not teach each and every claim limitation of claims 1-20 and therefore, as a matter of law, cannot anticipate these claims. That is, Saylor does not teach: displaying a first map in one area of a display; displaying a second map in a second area of the display, wherein the first map and the second map depict at least a portion of an identical geographic region; making an annotation on a first region of the first map; and updating the second map to display the annotation at a geographic region that corresponds to the first region of the first map, as recited in the amended claims.

Contrary to the Examiner's assertions in the Official Action, Saylor also does not teach, disclose or suggest the step of receiving an input that manipulates a first map, the input causing a computer system enabled for map manipulation to automatically manipulate a second map when the first map is manipulated, as required by Applicants' claims prior to the present amendment. In Saylor, a single overlapping map is updated

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in accordance with a user request. (see e.g., <u>Saylor</u> at col. 2, lines 38-40; col. 4, lines 7-9; col. 5, lines 30-32; and col. 7, lines 47-50.) Nowhere does <u>Saylor</u> mention the capability to receive an input that manipulates a first map, the input causing a computer system enabled for map manipulation to automatically manipulate a second map when the first map is manipulated.

Even though the cited reference fails to reach the teachings of Applicants' device, Applicants have nevertheless amended claims 1, 15 and 19 to maintain the scope of the previous claims, and more appropriately describe Applicants' invention. Therefore, the rejection of independent claims 1, 15 and 19 under 35 U.S.C. §102(b) as anticipated by <u>Saylor</u> should be withdrawn. The rejection of dependent claims 2-14, 16-18 and 20 should also be withdrawn as they depend on allowable subject matter as recited in the respective independent claims from which they directly or indirectly depend.

In view of the foregoing, it is submitted that the cited prior art fails to teach or suggest the Applicant's claimed invention. Applicants respectfully assert that the present application is in condition for allowance and request a notice to that effect.

If any extension of time under 37 C.F.R. § 1.136 is required to obtain entry of this response, and not requested by attachment, such extension is hereby requested. Please charge those fees to our deposit account 06-0916.

Attached hereto is a marked-up version of the changes made to the claims by this amendment. The attached page is captioned "**Version with markings to show changes made**." Deletions appear as normal text surrounded by [ ] and additions appear as underlined text.

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If any extension of time under 37 C.F.R. § 1.136 is required to obtain entry of this response, and not requested by attachment, such extension is hereby requested. If there are any fees due under 37 C.F.R. § 1.16 or 1.17 that are not enclosed, including any fees required for an extension of time under 37 C.F.R. § 1.136, please charge those fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: February 19, 2003

By: _____
Leonard Smith
Reg. No. 45,118

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE SPECIFICATION:

Please amend the second full paragraph on page 7 of the specification to read as follows:

Map image synchronization is a method whereby two map images can be made to show the same geographic region at all times, maintaining this synchronization even after one of the images is panned, zoomed, scrolled, or otherwise caused to display a different region. Whenever such a change occurs on one map, the system causes the same change to occur on the other map as well. In this way, the two images continue to display the same region, [wit out] <u>without</u> the need of manually adjusting both maps. In addition the synchronization system allows annotations to be placed on either map at specified geographic locations, and causes a matching annotation to appear on the other map in the corresponding location.

Please amend the first and second full paragraphs on page 9 of the specification to read as follows:

Figure 4 shows a map manipulation process in accordance with the preferred embodiment. First, the data processing system loads and displays two maps, Map1 and Map2, according to a user selection **(step 400).** For purposes of this example, assume that Map1 is a digital raster

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map, and Map2 is a vector map showing substantially the same region. It should be noted that the maps displayed are not required to cover identical geographic regions, as long as they share some geographic area in common. Both maps according [o] to the preferred embodiment, are previously georeferenced. In an alternate embodiment, the system will allow the user to georeference one or both maps, if required.

Next, an initial geographic region, which is present on both maps, is [-] selected on Map[ ]1 and displayed by the system **(step 405)**. Since Map1 has been georeferenced, the boundaries of the selected region are determined, using Map1's set of georeferencing functions, in terms of longitude and latitude **(step 410)**.

Please amend the first and second full paragraphs on page 11 of the specification to read as follows:

Common changes, that might occur to change the region displayed include the user panning[ ], zooming, or scrolling one of the images. Annotations may be used to designate points of particular interest on the maps.

Certain minor adjustments are required in the display if a region is selected which is not entirely present on one or more of the maps, or if the aspect ratios of the screen display areas devoted to each map are different. In the first case, the system attempts a "best fit" when one map selection included area not found in the other map, and simply displays

blank additional area to fill the missing region, so that the map windows

will be filled and the synchronization of the images maintained. In the

second case, the other map can be scaled to reflect the same area, or

alternatively one or more of the map windows may be equipped with scroll

bars, so that the effective dimensions of the map windows become

identical.

IN THE CLAIMS:

Please amend claims 1-4, 7, 8, 11, 15, 19 and 20 as follows:

1.   (Amended)   A method [of map] for manipulating a map, comprising:

[receiving a selection of a first region of a first map; and

receiving an input that manipulates the first map, the input causing a

computer system enabled for map manipulation to automatically manipulate a

second map when the first map is manipulated]

displaying a first map in one area of a display;

displaying a second map in a second area of the display, wherein the first

map and the second map depict at least a portion of an identical geographic

region;

making an annotation on a first region of the first map; and

updating the second map to display the annotation at a geographic region

that corresponds to the first region of the first map.

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2.   (Amended)   The method of claim 1 further comprising selecting [a] the

second map.

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3.   (Amended)   The method of claim 1 further comprising selecting [a] the first map.

4.   (Amended)   The method of claim 1 further comprising receiving a display of [a] the second map that is automatically associated with the first map.

7.   (Amended)   The method of claim 1 wherein the first map is a vector map, and [further comprising a] the second map [which] is a digital raster map.

8.   (Amended)   The method of claim 1 wherein the first map is a digital raster map, and [further comprising a] the second map [which] is a vector map.

11.   (Amended)   The method of claim 1 further comprising receiving a display of a second region associated with [a] the second map, the second region being geographically substantially similar to the first region of the first map.

15.   (Amended)   A computer readable medium [whose contents transform a computer system into a map manipulation device, by] containing instructions executable by a computer to manipulate a map, the method comprising:

[receiving a selection of a first region of a first map; and

receiving an input that manipulates the first map, the input causing a

computer system enabled for map manipulation to automatically manipulate a

second map when the first map is manipulated]

displaying a first map in one area of a display;

displaying a second map in a second area of the display, wherein the first

map and the second map depict at least a portion of an identical geographic

region;

making an annotation on a first region of the first map; and

updating the second map to display the annotation at a geographic region

that corresponds to the first region of the first map.

19.   (Amended)   [A computer memory containing a data structure capable of

enabling map manipulation, by] An apparatus for manipulating a map, comprising:

[receiving a selection of a first region of a first map; and

receiving an input that manipulates the first map, the input causing a

computer system enabled for map manipulation to automatically manipulate a

second map when the first map is manipulated]

means for displaying a first map in one area of a display;

means for displaying a second map in a second area of the display,

wherein the first map and the second map depict at least a portion of an identical

geographic region;

means for making an annotation on a first region of the first map; and

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means for updating the second map to display the annotation at a geographic region that corresponds to the first region of the first map.

20.   (Amended)   The [computer memory] apparatus of claim 19 further comprising [additional data structures capable of]:

means for receiving a command to change a view;

means for receiving a responsive display of the first map, the responsive display being representative of the user interaction; and

means for receiving of a display of a second region on the second map, the second region being geographically substantially similar to the first region.